

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

In re:

MURRAY ENERGY HOLDINGS CO., *et al.*,¹

Debtors.

Chapter 11

Case No. 19-56885 (JEH)
(Jointly Administered)

Judge John E. Hoffman, Jr.

BLACK DIAMOND COMMERCIAL FINANCE,
L.L.C., as Administrative Agent,

Plaintiff,

v.

MURRAY ENERGY CORP., MURRAY
ENERGY HOLDINGS CO., GLAS TRUST
COMPANY LLC, and U.S. BANK, N.A.,

Defendants.

Adv. Pro. No. 19-02143

**NOTICE OF DEFENDANTS' JOINT MOTION FOR PROTECTIVE ORDER
PURSUANT TO RULE 26(c) STAYING DISCOVERY PENDING
RESOLUTION OF THE AMENDED MOTION TO DISMISS**

Murray Energy Corp., Murray Energy Holdings Co., GLAS Trust Company LLC, as Administrative Agent, and U.S. Bank National Association, as Collateral Trustee (the "Defendants"), through their counsel, have filed papers with the court to obtain a protective order pursuant to Federal Rule of Civil Procedure 26(c) staying discovery pending resolution of their amended motion to dismiss (the "Motion").

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

¹ Due to the large number of Debtors in these chapter 11 cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. Such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.primeclerk.com/MurrayEnergy>. The location of Debtor Murray Energy Holdings Co.'s principal place of business and the Debtors' service address in these chapter 11 cases is 46226 National Road, St. Clairsville, Ohio 43950.

If you do not want the court to grant the relief sought in the Motion, then in accordance with Local Rule 7026-1 on or before **February 6, 2020**, you must file with the court a response explaining your position by mailing your response by ordinary U.S. Mail to United States Bankruptcy Court Southern District of Ohio, 170 North High Street, Columbus, Ohio 43215, Attn: Clerk of the Court OR your attorney must file a response using the court's ECF System.

The court must **receive** your response on or before the above date.

You must also send a copy of your response either by 1) the court's ECF System or by 2) ordinary U.S. Mail to:

- (a) each of the undersigned attorneys for the Defendants; and
- (b) counsel to Plaintiff Black Diamond Commercial Finance, L.L.C., as Administrative Agent,
 - (i) Ice Miller LLP, 250 West Street, Suite 700, Columbus, OH 43215, Attn: Tyson A. Crist and John C. Cannizzaro, and
 - (ii) Robbins, Russell, Englert, Orseck, Untereiner & Sauber LLP, 2000 K Street, N.W., 4th Floor, Washington, DC 20006, Attn: Lawrence S. Robbins, William J. Trunk, Ariel N. Lavinbuk, and Jack A. Herman.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the Motion and may enter an order granting that relief without further hearing or notice.

Dated: January 30, 2020
Columbus, Ohio

Respectfully submitted,

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